

Jay Edelson (ARDC No. 6239287) (*Admitted Pro Hac Vice*)
Rafey Balabanian (ARDC No. 6285687) (*Admitted Pro Hac Vice*)
KAMBEREDELSON LLC
350 North LaSalle Street
Suite 1300
Chicago, Illinois 60654
Tel: (312) 589-6370
Fax: (312) 589-6378
jedelson@kamberedelson.com
rbalabanian@kamberedelson.com

James E. Smyth II
Kummer Kaempfer Bonner
Renshaw & Ferrario
3800 Howard Hughes Parkway
Seventh Floor
Las Vegas, Nevada 89169
Tel: (702) 792-7000
Fax: (702) 796-7181
jsmyth@kkbrf.com

Attorneys for Plaintiff
THEODORE TRAPP and the putative class

Mr. David T. Brown (Nevada Bar No. 006914)
BROWN, BROWN & PREMSRIRUT
520 South 4th Street, 2nd Floor
Las Vegas, Nevada 89101
Tel: 702.384.5563
Fax: 702.385.1023
dbrown@brownlawlv.com

Attorneys for Defendants
BIG POPPAS, LLC AND O.G. ELIADES, A.D., LLC.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THEODORE TRAPP, on his own behalf and
on behalf of all others similarly situated,

Plaintiff,

v.

BIG POPPA'S, LLC, a Nevada limited
liability company d/b/a BADDA BING
MEN'S CLUB; SKY TOP VENDING, INC.,
a Nevada Corporation d/b/a CAN CAN
ROOM; LA FUENTE, INC., a Nevada
corporation d/b/a CHEETAH'S; C.P. FOOD
AND BEVERAGE, INC., a Nevada
corporation d/b/a CLUB PARADISE;

Case No. 2:09-cv-00995

**STIPULATED REQUEST TO STAY
PROCEEDINGS PENDING OUTCOME
OF SETTLEMENT DISCUSSIONS**

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

1 DÉJÀ VU SHOWGIRLS OF LAS VEGAS,
2 LLC, a Nevada limited liability company
3 d/b/a DÉJÀ VU SHOWGIRLS; PALOMINO
4 CLUB, INC., a Nevada corporation d/b/a
5 PALOMINO CLUB; SHAC, LLC, a Nevada
6 limited liability company d/b/a SAPPHIRE;
7 K-KEL, INC., a Nevada corporation d/b/a
8 SPEARMINT RHINO; D.2801
9 WESTWOOD, INC., a Nevada corporation
10 d/b/a TREASURES; LITTLE DARLINGS OF
11 LAS VEGAS, LLC, a Nevada limited liability
12 company d/b/a LITTLE DARLINGS; O.G.
13 ELIADES, A.D., LLC, a Nevada limited
14 liability company d/b/a OLYMPIC
15 GARDENS; LAS VEGAS
16 ENTERTAINMENT, LLC, a Nevada limited
17 liability company d/b/a LARRY FLYNT'S
18 HUSTLER CLUB; MICHAEL A. SALTMAN
19 d/b/a MINXX; RICK'S LAS VEGAS; FRIAS
20 MANAGEMENT, LLC, a Nevada limited
21 liability company d/b/a ACE CAB
22 COMPANY and A-NORTH LAS VEGAS
23 CAB; WESTERN CAB COMPANY, a
24 Nevada corporation d/b/a WESTERN CAB
COMPANY and WESTERN LIMOUSINE;
NEVADA CHECKER CAB
CORPORATION, a Nevada corporation d/b/a
CHECKER CAB COMPANY; NEVADA
STAR CAB CORPORATION, a Nevada
corporation d/b/a STAR CAB COMPANY;
NEVADA YELLOW CAB CORPORATION,
a Nevada corporation d/b/a YELLOW CAB
COMPANY; LUCKY CAB COMPANY OF
NEVADA, a Nevada corporation d/b/a
LUCKY TRANS; SUN CAB, INC., a Nevada
corporation d/b/a NELLIS CAB COMPANY;
CLS NEVADA, LLC, a Nevada limited
liability company d/b/a CLS
TRANSPORTATION LAS VEGAS; ON
DEMAND SEDAN SERVICES, LLC, a
Nevada limited liability company d/b/a ODS
LIMOUSINE and ODS CHAUFFEURED
TRANSPORTATION; BLS LIMOUSINE
SERVICE OF LAS VEGAS, INC., a Nevada
corporation d/b/a BLS LIMOUSINE
SERVICE OF LAS VEGAS; DESERT CAB,
INC., a Nevada corporation d/b/a DESERT
CAB COMPANY and ODYSSEY
LIMOUSINE; BELL TRANS A NEVADA
CORPORATION, a Nevada corporation d/b/a
BELL TRANS; TONY CHONG, an
individual; and DOE EMPLOYEES 1-1000;

Defendants.

1 Plaintiff THEODORE TRAPP ("Plaintiff" or "Trapp") and Defendants BIG POPPAS,
2 LLC d/b/a BADDA BING MEN'S CLUB and O.G. ELIADES, A.D., LLC d/b/a OLYMPIC
3 GARDENS, propose the following Stipulation and Proposed Order staying these proceedings for
4 90 days as to those Defendants. In support, the Parties state as follows:

5 **WHEREAS**, on June 2, 2009, Plaintiff filed a four-count putative class action complaint
6 ("the Complaint") against the Defendants alleging violations of Nevada's Racketeering Statute;

7 **WHEREAS**, Plaintiff caused Defendant Big Poppas, LLC to be served with a copy of
8 the summons and complaint in this matter on or about June 8, 2009;

9 **WHEREAS**, Plaintiff caused Defendant O.G. Eliades, A.D., LLC to be served with a
10 copy of the summons and complaint in this matter on or about June 9, 2009.

11 **WHEREAS**, by Stipulation filed July 9, 2009, the Parties agreed, subject to the approval
12 of this Court, to enlarge the time for Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC
13 to answer or otherwise plead to the Complaint until August 3, 2009.

14 **WHEREAS**, Plaintiff and Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC,
15 seek entry of an Order staying these proceedings as to those Defendants to enable the Parties to
16 focus their efforts on settlement discussions in the hopes of bringing an early resolution to this
17 matter;

18 **WHEREAS**, Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC deny the
19 material allegations of the Complaint, deny they committed any wrongdoing, and deny any
20 liability to Plaintiff or the putative class of individuals that he purports to represent;

21 **WHEREAS**, taking into account the burdens and expense of protracted litigation,
22 including the risks and uncertainties associated with class certification, protracted trials, and
23 appeals, the Parties have decided to engage in settlement discussions to determine whether a
24 speedy and efficient resolution to this case may be achieved;

NOW THEREFORE, the Parties hereby **STIPULATE** and **AGREE** as follows:

1. These proceedings are hereby stayed for ninety (90) days through and including
October 30, 2009, as to Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC.

1 **IT IS SO STIPULATED.**

2
3 THEODORE TRAPP, individually and
4 on behalf of all others similarly situated

BIG POPPAS, LLC d/b/a BADDA BING MEN'S
CLUB, and O.G. ELIADES, A.D., LLC d/b/a
OLYMPIC GARDENS

5 By: /s/ Jay Edelson
6 Jay Edelson (ARDC No. 6239287)
7 KAMBEREDELSON LLC
8 350 North LaSalle Street
9 Suite 1300
10 Chicago, Illinois 60654
11 Tel: (312) 589-6370
12 Fax: (312) 589-6378
13 jedelson@kamberedelson.com


14 *Attorneys for Plaintiff* THEODORE
15 TRAPP and the putative class

By: /s/ David T. Brown
Mr. David T. Brown (Nevada Bar No. 006914)
BROWN, BROWN & PREMSRIRUT
520 South 4th Street, 2nd Floor
Las Vegas, Nevada 89101
Tel: 702.384.5563
Fax: 702.385.1023
dbrown@brownlawlv.com

Attorneys for Defendants BIG POPPAS, LLC and
O.G. ELIADES, A.D., LLC

16 **IT IS SO ORDERED.**

17 Dated this 6 day of Aug, 2009

18
19
20
21
22
23
24


HONORABLE LLOYD D. GEORGE
UNITED STATES DISTRICT JUDGE